

UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

D-1 Dominick Deshawn Jackson, and

D-2 Jaylen Demetrius Ross

Case No.

Case: 2:21-mj-30436

Assigned To : Unassigned

Assign. Date : 9/14/2021

Description: RE: DOMINICK
JACKSON, JAYLEN ROSS (EOB)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of August 29, 2021 and September 2, 2021 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:*Code Section**Offense Description*(D-1 and D-2) 18 U.S.C. § 2119
(D-1 and D-2) 18 U.S.C. § 924(c)
(D-1 and D-2) 18 U.S.C. § 2Carjacking
Use of a firearm during and in relation to a crime of violence (carjacking)
Aiding and abettingThis criminal complaint is based on these facts:
see attached affidavit.☒ Continued on the attached sheet.Sworn to before me and signed in my presence
and/or by reliable electronic means.Date: September 14, 2021City and state: Detroit, Michigan*Complainant's signature*Patrick R. Cecile, Task Force Officer (FBI)*Printed name and title**Judge's signature*Hon. David R. Grand, United States Magistrate Judge*Printed name and title*

AFFIDAVIT

I, Patrick R. Cecile, being duly sworn, depose and state as follows:

I. INTRODUCTION

1. I have been employed as a Wayne State University Police Officer for seven years and I have been assigned to the Federal Bureau of Investigation Violent Crime Task Force (VCTF) as a Task Force Officer since September 2019. During this time, I have investigated federal violations concerning crimes of violence, firearms, and narcotics. I have gained experience through training and everyday work related to these types of investigations.

2. As a Task Force Officer, I am an “investigative or law enforcement officer of the United States” within the meaning of Title 18, United States Code, Section 2510(7), and I am empowered by law to conduct investigations and make arrests of offenses enumerated in Title 18, United States Code, Section 2516. I am a law enforcement officer with the authority to execute warrants issued under the authority of the United States.

3. The statements contained in this affidavit are based on my experience and background as a task force officer and on information provided by police officers, other agents of the FBI, and other law enforcement personnel. The information outlined below is provided for the limited purpose of establishing

probable cause and does not contain all of facts known to law enforcement related to this investigation.

4. This affidavit is made in support of a criminal complaint charging **Dominick Deshawn Jackson** and **Jaylen Demetrius Ross** with taking a motor vehicle transported, shipped, or received in interstate commerce from the person or presence of another by force and violence or by intimidation and with intent to cause death or serious bodily harm, in violation of 18 U.S.C. § 2119, and brandishing a firearm during and in relation to a crime of violence (carjacking), in violation of 18 U.S.C. § 924(c).

II. SUMMARY OF THE INVESTIGATION

INCIDENT NUMBER #1

5. On August 29, 2021, Victim TR was working as a driver for the ride sharing company “Lyft.” Victim TR was driving her black 2018 Toyota Corolla, Vehicle Identification Number (VIN) of 2T1BURHE2JC030688 bearing a Michigan license plate of DSJxxxx. Victim TR accepted a ride request to pick up “JARED” at the location of 2**** Joy Rd., Detroit, Michigan. The location is a Mobile gas station.

6. On August 29, 2021 around 5:20 pm, Victim TR pulled up to the gas pumps located at 2**** Joy Rd. to pick up “JARED”. Victim TR states she was approached by two (2) males, Victim TR asked if he was “JARED” and the taller

of the two responded “YES” before both males entered the backseat of her vehicle. Victim TR pulled out of the gas station. One of the occupants asked Victim TR if they had a mask he could use which Victim TR provided. The male then stated “this is a nice car” before producing a handgun, placing it between Victim TR and the passenger seat. The male then stated “Leave everything in the car, phone and purse, or I’m gonna shoot you.” Fearing for her life, victim TR stopped the vehicle, got out and fled.

7. After exiting the vehicle, Victim TR started walking and the vehicle drove away. Victim TR walked to the bus stop and asked an unknown individual to contact the police, which they did. Detroit Police Officers made the location and completed police report 2108290262.

8. On August 29, 2021, members of Detroit Commercial Auto Theft Section (CATS) were notified of the incident and made the location to investigate. Victim TR who provided the information regarding the case. Det. Terry Cross-Nelson was able to observe cameras from the location (2**** Joy Rd., Detroit, MI) on “Project Greenlight”. Det. Cross-Nelson disseminated the video to members at the scene and myself. I observed two (2) males walk into the gas station at 5:21 pm. The two (2) males then exit the gas station a short time later and sit on a curb in close proximity to the location.

9. The two (2) males are shown below:



10. At approximately 5:27 pm, Victim TR arrives at the location in her black 2018 Toyota Corolla. The two (2) males who are in the above images are observed entering the Victim TR's vehicle at approximately 5:29 pm. Suspect 1 - The male wearing the hat and the hooded sweatshirt is observed getting into the rear passenger seat on the driver's side. Suspect 2 - The male with the black long sleeve shirt and no hat is observed entering the rear passenger side seat. The vehicle is then observed on surveillance cameras leaving the area north bound on Evergreen St.

11. Victim described Suspect 1- who sat directly behind the driver's seat, as a black male, approximately 21 years of age, dark brown complexion, approximately 5'2" tall, wearing all black, short hair, and armed with a black revolver handgun. Victim TR described Suspect 2 - who sat in the rear passenger

side seat, as a black male, approximately 20 years of age, 5'4" tall, dark brown complexion, wearing all black, and who claimed his name was "Jared." Victim TR stated that Suspect 1 produced a firearm after complementing her on her vehicle. Victim TR described the firearm as a black "revolver."

12. On August 29, 2021, the Detroit Police completed a State of Michigan search warrant for Lyft, Inc., and records maintained by the rideshare company. Notable information contained in the return was that the "Passenger/Rider" who ordered the ride from 2**** Joy Rd., Detroit, MI. The account records revealed that the Passenger/Rider name was changed on August 29, 2021 three (3) times. The account was originally registered to "Dom Jackson" the name was then changed on the account to "James Brown" and finally to "Jarrett Burns". The registered email address for the account was also changed on August 29, 2021 from domoj237@gmail.com to jarretburns806@gmail.com.

INCIDENT NUMBER #2

13. On September 2, 2021, Victim DW reported to the Detroit Police Officer that he was the victim of an armed carjacking. Victim DW reported he was an Uber driver and was picking up an Uber ride at 1**** W. 7 Mile in the City of Detroit, County of Wayne. Victim DW reported the ride was ordered through Uber between 16:30 hrs. and 16:45 hrs. on September 2, 2021. Victim DW picked up two unknown black males from the requested ride location of 1**** W. 7 Mile Rd.

Victim DW stated that he arrived at 1**** W. 7 Mile Rd. and two (2) black males in their 20's were standing outside of the location, both males walked up to victim DW's vehicle which had an Uber sign in the front window. Victim DW stated that both black males got into his rear passenger seat on the same side of the vehicle.

Victim DW asked the suspects "Which one of you is James?" The subject sitting in the rear on the passenger side stated "I am." Victim DW described Suspect 1 who identified as "James" as a black male, dark brown complexion, approximately 5'7" in height, slim build, wearing a black mask and black doo rag. Victim DW described Suspect 1 as having a back pack. Victim DW stated that upon taking a left hand turn onto W. 7 Mile from Huntington St. (in front of 1**** W. 7 Mile Rd. / Aspen Cleaners) he asked both suspects if he was going the wrong way.

Victim DW stated that he believed Suspect 1 "James" responded "Yeah, turn the fuck around and pull this mother fucker over and get out." Victim DW stated he looked at Suspect 1 "James" retrieve a black revolver style handgun from the back pack he was wearing and point it at victim DW's head. Fearing for his life, victim DW stated he parked on W. 7 Mile Rd. and got out. Victim DW stated he fled around the rear of his Scion and observed Suspect 2, who was seated directly behind him and next to Suspect 1 jump over the seat and get into the driver seat of his Scion. Victim DW described Suspect 2 as a black male, medium complexion, with a height and build similar to Suspect 1. Victim DW described Suspect 2 as

wearing a baseball cap and a mask, and being in his early 20's. Victim DW reported the suspects were last observed heading south on an unknown street in his vehicle. Victim DW described both suspects as black males, being in their 20's. Victim DW described one of the suspects as wearing a doo-rag. Victim DW described his carjacked vehicle as: black, 2015, Toyota Scion, MI plate: SCxxxx, VIN: JTLZE4FE3FJ068707. The Detroit Police report for the incident is: 2109020347.

14. On September 3, 2021, Wayne State University Police Officer / Detroit Police Commercial Auto Theft Task Force (CATS) Officer Greg Fenech was assigned this investigation. Fenech and CATS P.O. Hebner reviewed project greenlight footage from 193** W. 7 Mile Road in the City of Detroit, County of Wayne. Upon reviewing the date of September 2, 2021, law enforcement located video surveillance footage of two black males exiting 1**** W. 7 Mile Road. At approximately 16:43 hrs., a black Toyota Scion was observed pulling up at the location and picking up the two unknown black males. The vehicle then turns onto W. 7 Mile Road. 193** W. 7 Mile Road is located on the same side of the street as 1**** W. 7 Mile Road and is just east across Huntington Road from 1**** W. 7 Mile Road.

15. P.O. Fenech reviewed video surveillance from 1**** W. 7 Mile (Aspen Cleaners). Upon review of the video, P.O. Fenech observed the two

suspects inside of the location. Both suspects can be observed inside of the location for some time before exiting the location and shortly thereafter entering Victim DW's Scion. Suspect 1 is wearing a black head covering (doo-rag), a black t-shirt, black pants and white sandal style shoes appears to be charging a phone while at the location. Suspect 2 appears to be wearing a Detroit Baseball hat, a black Adidas T-Shirt, black track pants, and black croc style shoes.



16. On September 3, 2021, P.O. Fenech spoke over the phone with Victim DW and obtained a brief summary of events related to his carjacking. Victim DW advised the name displayed on his Uber app for the customer he was going to pick up from 1**** W. 7 Mile Road was "James."

17. On September 3, 2021, P.O. Fenech sent Uber an emergency request for driver and rider information related to the Uber ride leading up to the armed

carjacking. Uber honored the request and sent a return that included customer information for the rider, GPS coordinates for the Uber driver's phone (victim), and GPS coordinate with IP addresses for the customer's (suspect) account. Uber's request reference number is 00228276.

18. I discovered through Uber's records return that the customer information for the rider who requested the Uber ride prior to the carjacking is as follows: Name (James Brown), Phone Number (313-6**-0***), Email Address (jaylenross2023@icloud.com).

19. P.O. Fenech contacted me and advised of the similar circumstances between his Armed Carjacking of Victim DW and the similar circumstances to the Armed Carjacking of Victim TR. P.O. Fenech advised that his suspects utilized a name of "James Brown", Similar to the name previously listed on the Lyft account that was used in the carjacking of Victim TR. The physical descriptions provided in both incidents also matched.

INCIDENT NUMBER #3

20. On September 3, 2021 at approximately 3:59 pm, Hamtramck Police observed two (2) vehicles traveling north bound Joseph Campau Rd. near Hewitt Rd. in Hamtramck, MI. Both vehicles were traveling without license plates attached to the cars. Officers observed both vehicles turn west bound on Hewitt Rd. in violation of the one-way for eastbound traffic on Hewitt Rd. The first

vehicle was described as a black four (4)-door sedan, the second vehicle was described as a black “un-plated” Scion. Officers initiated a traffic stop in the area of Hewitt Rd. and Lumpkin Rd. Both vehicles accelerated, disregarding the traffic stop and continuing westbound on Hewitt toward Lumpkin Rd. Officers observed the black Scion lose control as it attempted to turn northbound on Lumpkin Rd. The Scion struck a fence rendering it inoperable. The black sedan continued northbound on Lumpkin Rd. The driver of the black Scion who was the sole occupant of the vehicle fled on foot after a short pursuit the driver was taken into custody by Hamtramck Police. The driver was identified as **Jaylen Demetrius Ross** (B/M, DOB: XX/XX/2001). ROSS provided his name and date of birth to officers while on scene. While on scene ROSS made multiple statements to officers. ROSS stated “my cousin stole these cars and he gave me this car for free.” And, “your partner is about to find a gun I have in my car.” Law Enforcement queried the vehicle identification number (VIN) attached to the Scion which returned stolen out of Detroit, MI. The Scion was confirmed as Victim DW’s vehicle that was taken in the above mentioned carjacking on September 2, 2021. Law enforcement conducted an inventory search of the vehicle while on scene and located a black Smith & Wesson .357 caliber revolver in the glove compartment. The revolver was loaded with six (6) live rounds of ammunition. Police also

recovered a black Under Armor baklava mask that ROSS was wearing when taken into custody.

21. Hamtramck Officers on scene then observed a black sedan traveling southbound on Lumpkin Rd. when ROSS stated “That’s him!” Officers advised that the black sedan that was originally observed in front of the Scion that was driving at excessive speeds and had no Michigan License plate attached was traveling on Lumpkin Rd, approaching Wyandotte St. Additional Hamtramck Police Officers responded to the area to initiate a traffic stop on the Black Toyota Corolla. The Corolla attempted to reverse up a curb while on Wyandotte St. before coming to a stop in front of 23** Wyandotte St., Hamtramck, MI. The driver and sole occupant of the Corolla was detained and later identified as **Dominick Jackson** (B/M, DOB: XX/XX/2001). The vehicle identification number (VIN) attached to the Corolla was queried and returned stolen out of Detroit, MI. The Corolla was confirmed as Victim TR’s vehicle that was taken in the carjacking from August 29, 2021 as detailed in paragraphs five (5) and six (6).

22. Both ROSS and JACKSON were arrested for receiving and concealing stolen property as well as fleeing and eluding police. Both were lodged at the Hamtramck Police Department without incident.

23. A photo array was created including a photo of ROSS along with the photos of five others males of similar age, complexion and hair style.

24. On September 5, 2021, P.O. Fenech administered the photo lineup and victim DW identified the photo of ROSS as the subject who produced the firearm during the carjacking of his Scion.

25. As detailed above ROSS was arrested by Hamtramck Police Department while in control of victim DW's carjacked vehicle documented above. A firearm (revolver) was also recovered from the vehicle that matches the description of provided by both victim TR and victim DW. Surveillance video that I observed that was prior to the carjacking of victim DW fits the description given of the suspect wearing a black "doo-rag;" ROSS was taken into custody wearing a black Under Armor balaclava. Additionally the email address assigned to the email address provided in the Uber records return was jaylenross2023@icloud.com.

26. The photos shown below are from the Aspen Cleaners, 2**** Joy Rd., and the Michigan Secretary of State Photo of Jaylen ROSS.



27. On September 9th, 2021, both Victim TR's and Victim DW's vehicles were forensically and physically searched by Detroit FBI Evidence Recovery Team (ERT). Both TR and DW completed consent forms for their respective vehicles to be searched. I was present for the search and briefed the FBI ERT on circumstances and items of importance. During the search in Victim DW's Scion one of the items recovered from the front passenger floor board of the vehicle was a black t-shirt with a graphic on the front of it. The shirt is similar in class and characteristics to what Suspect 1 is observed wearing in surveillance video from the Aspen Cleaners. See the below photos for the shirt recovered from the Scion on the left, and the image from Aspen Cleaners of Suspect 1 on the right.



28. Additionally located in the search of Victim TR's Toyota Corolla was a Nike backpack. Similar to class and characteristics to that observed in both

surveillance video from 2**** Joy Rd., Detroit, MI and 1**** W. Seven Mile Rd. Detroit, MI (Aspen Cleaners). Victim DW described Suspect 1 – ROSS as retrieving the black revolver style firearm from a backpack. Shown in the photographs below, on the left is the back pack recovered from the trunk of the Victim TR's Toyota Corolla where Dominick Jackson was taken into custody driving as the sole occupant. The photograph on the right is from surveillance video from Aspen Cleaners showing Suspect 1 – ROSS (Left) and Suspect 2 – JACKSON wearing a Detroit Ball Cap and a backpack similar in class and characteristics to that which was recovered in the search of Victim TR's Corolla.

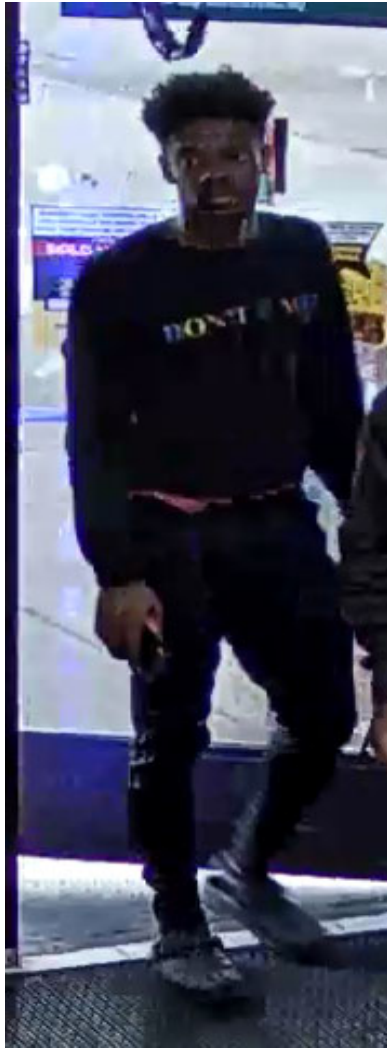


29. In each of the carjacking events documented above the individual accompanying ROSS appears to be JACKSON. In the carjacking of Victim TR's Toyota Corolla the account ordering the Lyft changed the account name which

originally was “Dom Jackson” on August 29, 2021, the day of the carjacking.

Additionally the original email associated to the Lyft account that ordered the ride was changed from domoj237@gmail.com also occurring on August 29, 2021.

ROSS and JACKSON aided and abetted one another during the taking of these motor vehicles. See photos shown below, the photo on the left is from inside 2**** Joy Rd., Detroit, MI on August 29, 2021 moments before the Carjacking of victim TR’s Toyota Corolla. The photo on the right is from 1**** W. 7 Mile Rd. (Aspen Cleaners) moments before the carjacking. The photo on the bottom is of Dominick JACKSON’s Michigan Secretary of State photo.



30. Additionally items of clothing recovered from the Hamtramck Police Department from JACKSON's person included Black Adidas track pants and black Croc style shoes. Both items of clothing can be observed being worn by Suspect 2 – JACKSON in surveillance video from 2**** Joy Rd., Detroit, MI before the carjacking of Victim TR's Toyota Corolla in which JACKSON was arrested by Hamtramck Police as the sole occupant. Also observed in surveillance video from 1**** W. 7 Mile Rd., Detroit, MI (Aspen Cleaners) before the carjacking of Victim DW's SCION.

31. Based on the VIN number assigned to Victim TR's Toyota Corolla it was manufactured in Cambridge, Ontario, Canada.

32. Based on the VIN number assigned to Victim DW's Scion XB it was manufactured in Takaoka, Japan.

III. CONCLUSION

33. Based on the above information, probable cause exists that **Jaylen Demetrius Ross** and **Dominick Deshawn Jackson** did take a motor vehicle transported, shipped, or received in interstate commerce from the person or presence of another by force and violence or by intimidation and with intent to cause death or serious bodily harm, in violation of 18 U.S.C. § 2119. Further, **Jaylen Ross** and **Dominick Jackson** brandished a firearm during and in relation to a crime of violence (carjacking), in violation of 18 U.S.C. §§ 924(c)(1)(A) and 2.

34. The Toyota Corolla ROSS and JACKSON carjacked was manufactured inside the country of Canada, and as such was “shipped, or transported in interstate commerce” as recited in 18 U.S.C. § 2119.

35. The Scion XB ROSS and JACKSON carjacked was manufactured inside the country of Japan, and as such was “shipped, or transported in interstate commerce” as recited in 18 U.S.C. § 2119.

36. Therefore, probable cause exists to believe that ROSS and JACKSON aided and abetted one another as they violated 18 U.S.C. § 2119 with respect to Victim TR and Victim DW.

37. In consideration of the foregoing, I respectfully request that this Court issue a complaint and arrest warrants against ROSS and JACKSON for violation of 18 U.S.C. §§ 2119, 924(c)(1)(A), and 2.

Respectfully submitted,



Patrick R. Cecile, Task Force Officer
Federal Bureau of Investigation

Sworn to before me and signed in my
presence and/or by reliable electronic means.



HON. DAVID R. GRAND
UNITED STATES MAGISTRATE JUDGE

Date: September 14, 2021